

WILKINSON ) BARKER ) KNAUER ) LLP

1800 M STREET, NW  
SUITE 800N  
WASHINGTON, DC 20036  
TEL 202.783.4141  
FAX 202.783.5851  
WWW.WBKLaw.COM  
HOWARD M. LIBERMAN  
202.383.3373  
HLIBERMAN@WBKLAW.COM

REDACTED FOR PUBLIC INSPECTION

September 25, 2018

VIA HAND DELIVERY

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Room TW-B204  
Washington, DC 20554

Re: *Securus Technologies Inc., and Inmate Calling Solutions, LLC,  
Consolidated Applications for Consent to the Transfer of Control of  
Licenses and Authorizations, WC Docket No. 18-193*

Dear Ms. Dortch:

Inmate Calling Solutions, LLC d/b/a ICSolutions ("ICS") submits the enclosed materials in response to the Wireline Competition Bureau's ("WCB") Information and Document request ("Information Request") dated September 11, 2018 in connection with the above-referenced transaction and in accordance with the Protective Order in this docket.<sup>1</sup> Specifically, the enclosed materials describe and provide examples of the data ICS proposes to provide to the Commission in response to Specification No. 19 of the Information Request.

Because ICS is producing materials that contain information that meets the requirements for treatment as "Highly Confidential,"<sup>2</sup> ICS is filing these documents pursuant to the procedures

---

<sup>1</sup> *Securus Technologies Inc., and Inmate Calling Solutions, LLC, Consolidated Applications for Consent to the Transfer of Control of Licenses and Authorizations*, Protective Order, WC Docket No. 18-193, DA No. 18-938 (rel. Sept. 11, 2018) ("Protective Order").

<sup>2</sup> Consistent with the Protective Order, *id.* at ¶ 3, ICS obtained written approval from Commission staff to designate certain material as Highly Confidential. Pursuant to discussions with staff, documents and information provided with this response, unless specifically reviewed and downgraded, have been

Marlene H. Dortch  
September 25, 2018  
Page 2

established in the Protective Order and in the Information Request. Enclosed please find a CD containing the files associated with this production of documents, tagged as "Highly Confidential" in accordance with the Commission's staff's instructions and Protective Order in this docket. Pursuant to the procedures set forth in the Protective Order, a copy of the filing is being provided to the Secretary's office, and two copies are being delivered to the WCB staff. A redacted copy of this submission is being filed electronically through the Commission's Electronic Comment Filing System.

ICS has made diligent efforts to ensure that none of the material it is submitting herewith is privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged materials may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. ICS requests that any privileged materials inadvertently produced be returned to ICS as soon as such inadvertent production is discovered by any party, and reserves all rights to seek return of any such documents.

If you have any questions arise concerning this submission, please contact the undersigned.

Very truly yours,



Howard M. Liberman

*Counsel to Inmate Calling Solutions, LLC  
d/b/a ICSolutions*

Enclosures

---

classified as "Highly Confidential." Notwithstanding this default classification, ICS is not asserting Highly Confidential status for any documents that have been publicly released (which would be Public) or for third party materials that are copyrighted (which would be considered Confidential).

**REDACTED**

---